

Scott Walker  
Governor



**State of Wisconsin**

**COUNCIL FOR THE DEAF AND HARD OF HEARING**  
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Department of Safety and Professional Services  
Dan Williams  
1400 East Washington Avenue, Room 112  
Madison, WI 53703

Dear Mr. Williams,

The Governor's Council for the Deaf and Hard of Hearing is contacting you regarding the coverage of Video Remote Interpreting (VRI) services under the Wisconsin Sign Language Interpreter License. It is our understanding that DSPS currently does not have a clear position as to whether VRI services are to be covered within the scope of the license. VRI interpreters who are providing services into the state of Wisconsin from anywhere outside the state may not meet the minimum standards set forth by the Wisconsin Sign Language Interpreter License, thus leaving Wisconsin residents unprotected and vulnerable. This is very concerning to the Council as it means there is a significant likelihood that a large number of Wisconsin residents are receiving interpreting services from unlicensed professionals, which is in direct conflict with the intent of Act 360.

When the Wisconsin community came together and partnered with the legislators that authored and endorsed this bill, it was with the intention that interpreters providing services to Wisconsin residents would be licensed. The language of the law did not differentiate between in-person services and video remote services because the intention was that sign language interpreters providing interpreting services to Wisconsin residents would be licensed regardless of the medium. An unfortunate fact is that some entities are currently using VRI services as a way around the minimum standards set forth in Act 360 because unlicensed and often unqualified interpreters are cheaper.

Interpreters who do not meet the minimum standards in Act 360 can endanger the financial well-being, physical health, mental health and even the lives of Wisconsin residents. The risks of using such unregulated services fall directly upon the consumers who are Deaf and Hard of Hearing. By coming to a clear position that VRI is covered within the scope of Act 360 would give these vulnerable consumers the ability to ensure that their interpreting services, whether in person or through VRI, meet the minimum standards of the Wisconsin Sign Language Interpreter License.

If DSPS has not yet come to a clear position on VRI because of a lack of a clear understanding of VRI and how it works, we encourage you to seek guidance immediately from the Sign Language

Interpreter Council or contact the Office for Deaf and Hard of Hearing within the Division of Long Term Care. Our Council would also be happy to serve as a resource.

We advise and encourage DSPS to quickly adopt a clear position that VRI services are covered within the scope of Act 360. Until DSPS adopts this position a loop hole exists where the Deaf and Hard of Hearing communities in Wisconsin will continue to fall victim to unlicensed, unprofessional and unqualified interpreters, thus defeating the purpose of Act 360.

Your prompt attention is requested in this matter. Please do not hesitate to contact us if you have any further questions.

Kind regards,

The Governor's Council for the Deaf and Hard of Hearing

CC: Wisconsin Association of the Deaf, Office for the Deaf and Hard of Hearing, Wisconsin Registry of Interpreters for the Deaf, Deaf Unity, Center for Communication, Hearing & Deafness, Wisconsin Families for Hands and Voices, Southern Lakes Association of the Deaf, Delavan, Greater Milwaukee Association of the Deaf, Madison Association of the Deaf, Racine-Kenosha Deaf Club, Wisconsin Rainbow Alliance of the Deaf, Central Wisconsin Deaf Club